

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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|--|---|-------------------------------|
| IN RE: | : | CHAPTER 13 |
| WILLIAM HARVEY GOODLING | : | |
| fdba William H. Goodling Construction | : | CASE NO. 1:21-bk-01819 |
| KELLY JEAN GOODLING | : | |
| Debtors | : | |
| | : | |
| US BANK TRUST NATIONAL | : | |
| ASSOCIATION, not in its Individual | : | |
| Capacity, but solely as Owner Trustee for | : | |
| VRMTG Asset Trust, | : | |
| Movant | : | |
| | : | |
| v. | : | |
| | : | |
| WILLIAM HARVEY GOODLING | : | |
| fdba William H. Goodling Construction | : | |
| KELLY JEAN GOODLING, | : | |
| Respondents | : | |

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
6. Admitted that Debtors are behind in mortgage payments because the Debtor was operated on and did not have income, but have scheduled two mortgage payments to be made today and in two weeks each in the amount of \$1158.62.

7. Proof of amounts owed is demanded at trial and this paragraph is therefore denied pending Movant's acceptance of proffered payments.
8. Denied that Movant has demonstrated cause for relief. Movant holds the first mortgage on the Debtors' property and is protected by an equity cushion. The asserted value of the real estate is \$350,000; Movant's proof of claim is in the amount of \$171,521.92, leaving an equity cushion of \$178,478.08.
9. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtors are responsible for payment of attorney fees and costs are therefore denied.
10. Admitted that Movant has not waived its right to seek reimbursement. Denied that Movant is entitled to further reimbursement.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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